

Exhibit 2

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA
ANNA MARIA TARULLO,
Plaintiff,

v.

CIVIL ACTION NO. 21-C-

CHARLESTON AREA MEDICAL CENTER, INC.;
and TIFFANY LASKY, D.O.,

Defendants.

Webster

2021 SEP 15 PM 1:49
CATHY S. CATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT
817

<u>Defendant</u>	<u>Days to Answer</u>	<u>Type of Service</u>
Charleston Area Medical Center, Inc.	30	Secretary of State
Tiffany Lasky, D.O	20	Personal Service

Please issue summons in the above-styled action as indicated
Original and 2 copies of Complaint furnished herewith.



Ben Salango (WVSB #7790)
SALANGO LAW, P.L.L.C.
206 Capitol Street
Charleston, West Virginia 25331
Phone: (304) 342-0512
Fax: (304) 342-0513
Counsel for Plaintiff

PYMT TYPE: 2419 \$400
Rept #: 2419 \$200 5139
Iss. Sum. 2 cc No Sum. Iss
 Ret. to Atty. \$20em X
 Mailed CM/RM \$5 clk X
 Mailed to sos w/clk# _____
 Sent to _____ w/clk# _____ \$15 mdf X 2

PLAINTIFF: Anna Maria Tarullo	CASE NUMBER: 21-C _____
DEFENDANTS: Charleston Area Medical Center, Inc. and Tiffany Lasky, D.O.	

I. TYPE OF CASE:

TORTS	OTHER CIVIL	
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Adoption	<input type="checkbox"/> Appeal from Magistrate Court
<input checked="" type="checkbox"/> <i>Professional Malpractice</i>	<input type="checkbox"/> Contract	<input type="checkbox"/> Petition for Modification of Magistrate Sentence
<input type="checkbox"/> Personal Injury	<input type="checkbox"/> Real Property	<input type="checkbox"/> Miscellaneous Civil
<input type="checkbox"/> Product Liability	<input type="checkbox"/> Mental Health	<input type="checkbox"/> Other
<input type="checkbox"/> Other Tort	<input type="checkbox"/> Appeal of Administrative Agency	

II. JURY DEMAND: Yes No

CASE WILL BE READY FOR TRIAL BY (MONTH/YEAR): Unknown

III. DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS DUE TO A DISABILITY OR AGE? YES NO
IF YES, PLEASE SPECIFY:

- Wheelchair accessible hearing room and other facilities
- Interpreter or other auxiliary aid for the hearing impaired
- Reader or other auxiliary aid for the visually impaired
- Spokesperson or other auxiliary aid for the speech impaired
- Other:

Attorney Name: Ben Salango (#7790)

Representing: Plaintiff Defendant Cross-Complainant Cross-Defendant

Firm: Salango Law, PLLC

Address: 206 Capitol Street, Charleston, WV 25301

Telephone: (304) 342-0512

Dated:

9.15.21

BS
Ben Salango (WV State Bar #7790)

IN THE CIRCUIT COURT OF KANAWHA COUNTY, WEST VIRGINIA
ANNA MARIA TARULLO,
Plaintiff,
v.
CHARLESTON AREA MEDICAL CENTER, INC.;
and TIFFANY LASKY, D.O.,
Defendants.

2021 SEP 16 PM 1:49
CATHY S. GATSON, CLERK
KANAWHA COUNTY CIRCUIT COURT
CIVIL ACTION NO. 21-C-817
Webster

COMPLAINT

For her Complaint against the Defendants, Plaintiff alleges as follows:

Parties

1. Plaintiff is a resident of Lexington, Kentucky.
2. Tiffany Lasky, D.O. is a resident of Charleston, Kanawha County, West Virginia.
3. Charleston Area Medical Center, Inc., is a domestic corporation with its principal place of business located in Charleston, Kanawha County, West Virginia.

Venue and Jurisdiction

4. In accordance with West Virginia Code § 56-1-1, venue is appropriate in the Circuit Court of Kanawha County because the cause of action arose in Kanawha County, West Virginia.

5. Plaintiff has substantially complied with all pre-litigation requirements contained in W. Va. Code § 55-7B-6.

Facts

6. On August 28, 2020, Plaintiff presented to Charleston Area Medical Center Women's and Children with increased abdominal pain and nausea following a laparoscopic

cholecystectomy earlier that day. Plaintiff was experiencing tachycardia and tachypnea. An x-ray revealed "Free intraperitoneal air felt to be postoperative in this patient recent cholecystectomy."

7. Plaintiff was evaluated by resident physicians at Charleston Area Medical Center and Tiffany Lasky, D.O. who failed to timely diagnose and treat a bowel injury that occurred during the laparoscopic cholecystectomy on August 28, 2020.

8. As a result of the delay in diagnosis and treatment, Plaintiff experienced septic shock and sustained severe and permanent injuries.

9. Charleston Area Medical Center, Inc., through its employees and agents, deviated from the accepted standard of care on August 28, 2020, by failing to timely diagnose and treat the injury to Plaintiff's bowel.

10. Defendant Tiffany Lasky, D.O. deviated from the accepted standard of care on August 28, 2020, by failing to timely diagnose and treat the injury to Plaintiff's bowel.

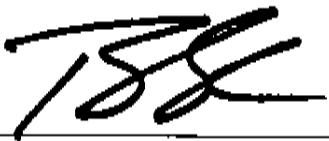
11. These deviations from the standard of care were a proximate cause of Plaintiff's severe and permanent injuries and damages.

12. As a direct and proximate result of Defendants' negligence, Plaintiff was deprived of a chance of recovery and/or said negligence increased the risk of harm to her which was a substantial contributing factor in bringing about her injuries.

WHEREFORE, Plaintiff respectfully demands judgment against Defendants for an award of damages including, but not limited to economic and non-economic damages plus taxable court costs and interest.

PLAINTIFF DEMANDS A TRIAL BY JURY.

ANNA MARIA TARULLO,
By counsel,



Ben Salango (WVSB #7790)
SALANGO LAW, P.L.L.C.
206 Capitol Street
Charleston, West Virginia 25331
Phone: (304) 342-0512
Fax: (304) 342-0513
Counsel for Plaintiff